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Sara Wright and Aggrieved Employees

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JESSICA JIMENEZ and ORLANDO MIJOS,
individually and on behalf of all other current
and former similarly situated California
employees of Defendants,

Plaintiffs,

v.

MENZIES AVIATION, INC., MENZIES
AVIATION GROUP (USA), INC., and DOES
1 THROUGH 10, inclusive

Defendants.

Case No.: 15-CV-02392-WHO

**PLAINTIFFS' NOTICE OF UNOPPOSED
MOTION FOR FINAL APPROVAL OF CLASS
ACTION AND PAGA SETTLEMENT**

Date:	January 3, 2018
Time:	2:00 p.m.
Judge:	Hon. William H. Orrick
Location:	Courtroom 2, 17 th Floor
Complaint Filed:	June 2, 2010
Trial Date:	April 24, 2017

TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on January 3, 2018 at 2:00 p.m., or as soon thereafter as
the matter may be heard, in Courtroom 2, of the United States District Court for the Northern District of
California, San Francisco Court House, located at 450 Golden State Avenue, San Francisco, California
94102, Plaintiffs on behalf of themselves and all others similarly situated, will, and hereby do move this
Court, pursuant to Rule 23 of the Federal Rules of Civil Procedure, for entry of a Final Order and

Judgment approving the class action settlement reached between the parties in this case. Through this Motion, Plaintiffs seek entry of an Order:

(1) Approving the class action settlement and the distribution plan agreed to by the Parties and preliminarily approved by the Court, which entails the non-reversionary distributions to Class Members, payment of attorney's fees and reimbursement of litigation costs to Class Counsel, payment to the Settlement Administrator, payment to the Labor and Workforce Development Agency out of the Settlement Fund of \$15,000.00;

(2) Approving that \$20,000.00 of the Settlement Fund be designated to resolve Private Attorneys General Act (PAGA) claims and that under Labor Code section 2699(i), 75% of which (\$15,000.00) will be paid to the California Labor and Workforce Development Agency, and 25% of which (\$5,000.00) will be distributed to Class Members;

(3) Approving the Class Representative's service award in the amount of \$10,000.00 to Plaintiff Sara Wright, \$6,500.00 to Plaintiff Jessica Jimenez and \$3,500.00 to Plaintiff Orlando Mijos to be paid from the Settlement Fund;

(4) Approving the application for payment to Class Counsel of \$416,666.66 as reasonable attorney's fees to be paid from the Settlement Fund;

(5) Approving the payment of reasonable litigation costs of \$199,030.47 to Class Counsel to be paid from the Settlement Fund;

(6) Approving the payment of \$55,000.00 to the Claims Administrator, CPT Group, Inc., to be paid from the Settlement Fund.

This Motion is made on the grounds that the Settlement entered by the parties and preliminarily approved by the Court is the product of arm's length and good faith negotiations and it is fair and reasonable. The parties and the Settlement Administrator carried out the notice procedures ordered by this Court and there is no opposition to the settlement from within or outside the Class. The value of the Settlement favors final approval when considered against the substantial risks of continuing litigation. Thus, the Settlement meets all the criteria necessary for final approval. This Motion is based on this Notice, Plaintiffs' accompanying Memorandum of Points and Authorities in support of this Motion; the Court's June 7, 2017 Order granting Preliminary Approval; the concurrently filed Declaration of

1 Graham S.P. Hollis in Support of Plaintiff's Motion for an Award of Attorney's Fees and Costs, and
2 Exhibits attached thereto; the Stipulation of Class and PAGA Action Settlement and Release, and the
3 pleadings, all records and files in this action and such argument and evidence which may be presented at
4 or in connection with the hearing.

5 Dated: November 29, 2017

GRAHAMHOLLIS APC

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7 By: /s/ Graham S.P. Hollis

Vilmarie Cordero

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